

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF ALABAMA**

LINDA STOUT, et al.,

Plaintiffs,

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

v.

JEFFERSON COUNTY BOARD OF EDUCATION,

Defendant.

Civil Action Number  
2:65-cv-0396-MHH

**MOTION TO SUBSTITUTE NAMED PLAINTIFFS**

Plaintiffs, by their undersigned counsel, respectfully submit this Motion to Substitute Named Plaintiffs in this case, *Stout v. Jefferson County Board of Education*. The Motion is based on the following facts:

1. Blevin Stout initially commenced this action in 1965 on behalf of his minor daughter, Linda Stout, and others similarly situated.

2. This case has been treated as a class action under Federal Rule of Civil Procedure 23, and substitution is proper pursuant to Rule 23. Alternatively, substitution is proper under Federal Rules of Civil Procedure 17, 19, and 21.

3. Both Blevin and Linda Stout have now given up their mortal lives.

4. In 2015, this Court granted Plaintiffs' Motion to Substitute Named Plaintiffs (Doc. 1023); and Cartrena Carter, Lonnell and Alfordia Carter, Sandra Ray, and Ricky and Alene Reeves, on behalf of their minor children, were ordered to be substituted as the Named Plaintiffs

in this action. (Doc. 1024).

5. Neither Cartrena Carter, Lonnell Carter, Alforia Carter, Sandra Ray, Ricky Reeves nor Alene Reeves presently has a minor child enrolled in the Jefferson County School system.

6. Anthony Spencer and D. Jeffrey Jackson (“Movants”) respectfully request to be substituted as Named Plaintiffs on behalf of their children. Mr. Spencer moves on behalf of his child, C.S., who is enrolled in Jefferson County Schools. Mr. Jackson moves on behalf of his child, K.J., who is enrolled in Jefferson County Schools.

7. Movants are the parents of Black children enrolled, or eligible to enroll, in schools operated by Jefferson County Board of Education. Movants seek relief on their own behalf, on behalf of their minor children, and on behalf of all other parents or legal guardians and their minor children who are similarly situated and affected by the actions and policies of Defendant in this case. Movants are also residents of Jefferson County, Alabama. They have separately indicated to class counsel their willingness to serve as class representatives in this ongoing litigation. They understand and accept their responsibilities to the class if they are designated as named plaintiffs in this action.

8. Neither the United States nor the Jefferson County School Board opposes this Motion.

WHEREFORE, the premises considered, Plaintiffs pray that the Court will order the substitution of ANTHONY SPENCER and D. JEFFREY JACKSON as the Named Plaintiffs in this action.

Dated: May 20, 2024

Respectfully submitted,

*/s/ Arielle Humphries*

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing motion has been delivered to all counsel of record by the Court's electronic filing system on May 20, 2024.

Respectfully submitted,

/s/ Arielle Humphries

Arielle Humphries  
Counsel for Private Plaintiffs